

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

MICHAEL D. KALE  
DEBTOR

CASE NO. 1:19-BK-05203-HWV  
CHAPTER 13

-----  
BAYVIEW LOAN SERVICING LLC  
MOVANT

V.

MICHAEL D. KALE

CHARLES J. DEHART, II,  
TRUSTEE  
RESPONDENTS

Answer to Motion for Relief

ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY

AND NOW, this 28<sup>th</sup> day of August, 2020, comes the above Debtor, by his counsel, Brent Diefenderfer and CGA Law Firm, and answers the Motion for Relief from Stay filed by Bayview Loan Servicing LLC as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. Paragraph 4 refers to a writing for which the terms speak for itself.
5. Denied. Paragraph 5 refers to a legal conclusion for which no response is required.
6. Admitted.
7. Denied.

8. Denied. The Debtor intends to cure the post-petition mortgage arrears through a Stipulation or through an amended Chapter 13 Plan.

9. Denied. The cost and legal fees as set forth in the Motion are not reasonable. Strict proof at trial is demanded.

10. Denied. Paragraph 10 sets forth a legal conclusion for which no response is required

WHEREFORE, the Debtor requests that the Court not enter an Order lifting the Automatic Stay and dismissing the Motion of Movant.

Respectfully submitted,

CGA Law Firm, PC

By: /s/ Brent C. Diefenderfer  
Brent C. Diefenderfer, Esquire  
Sup. Ct. ID No. 93685  
135 North George Street  
York, PA 17401-1282  
Telephone: 717-848-4900  
Counsel for Debtor

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

MICHAEL D. KALE  
DEBTOR

CASE NO. 1:19-BK-05203-HWV  
CHAPTER 13

-----  
BAYVIEW LOAN SERVICING LLC  
MOVANT

V.

MICHAEL D. KALE  
and  
CHARLES J. DEHART, III,  
TRUSTEE  
RESPONDENTS

Certificate of Service

I certify that I am more than 18 years of age and that on August 28, 2020, a true and correct copy of the attached Answer to Motion for Relief from Automatic Stay was served upon the following parties in the following manner:

Name	Mode of Service
Office of the U.S. Trustee	Via CM/ECF
James Warmbrodt, Esquire KML Law Firm PC 701 Market Street Suite 5000 Philadelphia, PA 19106	Via CM/ECF

By: /s/ Brent C. Diefenderfer, Esquire